

Attorney Docket: 00343
U.S. Application No. 09/749,826 Art Unit 2631
Response to September 19, 2007 Office Action

REMARKS

In response to the Office Action dated September 19, 2007, the Assignee respectfully requests reconsideration based on the above amendments and on the following remarks.

Claims 1-7, 17-20, 23-34, and 36-37 are pending in this application. Claims 8-16, 21-22, 35, and 38-52 were previously canceled with prejudice or disclaimer.

Objection to Claims 3 & 17

The Office objected to claims 3 and 17 for informalities. These informalities have been corrected, and Examiner Parry is thanked for the keen eye.

Rejection of Claims 1-3 & 5-7 under 35 U.S.C. § 103 (a)

The Office rejected claims 1-3 and 5-7 under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent 6,889,385 to Rakib, *et al.* in view of U.S. Patent 6,732,366 to Russo. While *Rakib* is newly cited, *Russo* has been previously discussed in the record and need not be further explained.

These claims, however, are not obvious over *Rakib* and *Russo*. These claims already recite, or incorporate, features that are not taught or suggested by the proposed combination of *Rakib* and *Russo*. Independent claim 1, for example, recites "*a plurality of tuners and demodulators sending information signals to a media bus*," "*a system data bus coupled to the media bus and receiving the information signals*," and "*a network bus coupled to the system data bus and receiving the information signals*." The combined teaching of *Rakib* with *Russo* does not disclose this architecture. Examiner Parry argues that *Rakib* teaches these claimed features, but Examiner Parry is, very respectfully, mistaken. When Examiner Parry explains the rejection of independent claim 1, Examiner Parry equates *Rakib*'s "bus 756" to both the claimed media bus and to the system data bus. That is, Examiner Parry mistakenly asserts that *Rakib*'s "bus 756" teaches both "*a plurality of tuners and demodulators sending information signals to a*

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media bus" and "*a system data bus coupled to the media bus and receiving the information signals.*" *Rakib* does not teach or suggest the "bus 756" having this dual architecture. Because the proposed combination of *Rakib* and *Russo* is silent to at least these features, one of ordinary skill in the art would not think that claims 1-3 and 5-7 are obvious. These claims, then, cannot be obvious over *Rakib* and *Russo*, so the Office is respectfully requested to remove the § 103 (a) rejection of claims 1-3 and 5-7.

Rejection of Claims 17-19 & 25-33

The Office rejected claims 17-19 and 25-33 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib* and *Russo* and further in view of U.S. Patent 5,790,176 to *Craig*. *Craig*, too, has been previously discussed in the record and need not be further explained.

These claims, however, are not obvious over *Rakib*, *Russo*, and *Craig*. These claims recite, or incorporate, features that are not taught or suggested by the proposed combination of *Rakib*, *Russo*, and *Craig*. Independent claim 17, for example, recites "*a plurality of tuners and demodulators sending information signals to a media bus*," "*a system data bus connected to the media bus and connected to the plurality of tuners and demodulators* and receiving the information signals," and "*a network bus connected to the system data bus and receiving the information signals*" (emphasis added). Support for such features may be found at least at page 23, lines 1-16 and FIG. 6 of the as-filed application.

Rakib, *Russo*, and *Craig* do not teach or suggest at least these features. *Rakib* discloses a multi-tuner gateway, while *Russo* describes high capacity storage that is connected to a video switch. *Craig* also describes a data bus and an address control bus. Even so, the proposed combination of *Rakib*, *Russo*, and *Craig* does not teach or suggest the claimed architecture. That is, *Rakib*, *Russo*, and *Craig* are silent to "*a plurality of tuners and demodulators sending information signals to a media bus*," "*a system data bus connected to the media bus and connected to the plurality of tuners and demodulators* and receiving the information signals," and "*a network bus connected to the system data bus and receiving the information signals*"

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(emphasis added). Because the proposed combination of *Rakib*, *Russo*, and *Craig* is silent to at least these features, one of ordinary skill in the art would not think that claims 17-19 and 25-33 are obvious. These claims, then, cannot be obvious over *Rakib*, *Russo*, and *Craig*, so the Office is respectfully requested to remove the § 103 (a) rejection of claims 17-19 and 25-33.

Rejection of Claim 4

The Office rejected claim 4 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib* and *Russo* and further in view of U.S. Patent Application Publication 2002/0118954 to *Barton, et al.* *Barton* has been previously discussed in the record and need not be further explained.

Claim 4, though, is not obvious over *Rakib*, *Russo*, and *Barton*. Claim 4 depends from independent claim 1 and, thus incorporates the same distinguishing features. As the above paragraphs explained, both *Rakib* and *Russo* are silent to many of independent claim 1's features, and *Barton* does not cure these deficiencies. Because the proposed combination of *Rakib*, *Russo*, and *Barton* is silent to many of the features recited by independent claim 1, one of ordinary skill in the art would not think that claim 4 is obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claim 4.

Rejection of Claims 23 & 24

The Office rejected claims 23 and 24 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib*, *Russo*, and *Craig* and further in view of U.S. Patent 6,637,031 to *Chou, et al.*

Claims 23 and 24, though, are not obvious over *Rakib*, *Russo*, *Craig*, and *Chou*. Claims 23 and 24 depend from independent claim 17 and, thus incorporate the same distinguishing features. As the above paragraphs explained, *Rakib*, *Russo*, and *Craig* do not teach or suggest the architecture recited by independent claim 17. *Chou*, too, fails to teach or suggest "*a plurality of tuners and demodulators sending information signals to a media bus*," "*a system data bus connected to the media bus and connected to the plurality of tuners and demodulators and*

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receiving the information signals," and "a network bus connected to the system data bus and receiving the information signals" (emphasis added). Because the proposed combination of Rakib, Russo, Craig, and Chou is silent to at least these features, one of ordinary skill in the art would not think that claims 23 and 24 are obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claims 23 and 24.

Rejection of Claims 20 & 34

The Office rejected claims 20 and 34 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib, Russo, Craig, and Barton*. Claims 20 and 34, however, respectively depend from independent claims 17 and 26. The combined teaching of *Rakib, Russo, Craig, and Barton* fails to teach or suggest "*a plurality of tuners and demodulators sending information signals to a media bus," "a system data bus connected to the media bus and connected to the plurality of tuners and demodulators and receiving the information signals," and "a network bus connected to the system data bus and receiving the information signals*" (emphasis added). Because the proposed combination of *Rakib, Russo, Craig, and Barton* is silent to at least these features, one of ordinary skill in the art would not think that claims 20 and 34 are obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claims 20 and 34.

Rejection of Claim 36

The Office rejected independent claim 36 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib, Russo, Craig, and Chou*. Claim 36, though, recites many features that are not taught or suggested by *Rakib, Russo, Craig, and Chou*. Claim 36, for example, recites "*sending the information signals to a media bus connected to the plurality of tuners and demodulators," "receiving the information signals over a system data bus connected to the media bus," and "receiving the information signals over a network bus connected to the system data bus*" (emphasis added). As *Rakib, Russo, Craig, and Chou* are all silent to at least these features, one of ordinary skill in the art would not think that claim 36 is obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claim 36.

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Rejection of Claim 37

The Office rejected claim 37 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib*, *Russo*, *Craig*, *Chou*, and *Barton*. Claim 37, though, depends from independent claim 36 and, thus, incorporates the same distinguishing features and recites additional features. As *Rakib*, *Russo*, *Craig*, *Chou*, and *Barton* are all silent to many of independent claim 36's features, one of ordinary skill in the art would not think that claim 37 is obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claim 37.

If any issues remain outstanding, the Office is requested to contact the undersigned at (919) 469-2629 or scott@scottzimmerman.com.

Respectfully submitted,



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